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April 29, 2008

The Honorable Mary Pat Thyng  
J. Caleb Boggs Federal Building  
844 N. King Street  
Room 2124, Lockbox 8  
Wilmington, DE 19801

Re: *LG.Philips LCD Co., Ltd. v. Chi Mei Optoelectronics et al*,  
Case Nos. 06-726-JJF and 07-357-JJF

In preparation for the May 13, 2008 mediation, LG Display Co., Ltd. ("LG Display") and AU Optonics Corporation ("AUO") have identified certain of each other's license agreements that the other party would like to review. Many of the license agreements contain provisions requiring written consent prior to disclosing the agreement to a third party. Some of the agreements, however, contain provisions that permit disclosure if required by process of law or court compulsion. Accordingly, LG Display respectfully requests the Court to enter an order directing the parties to produce the requested license agreements, which includes any license agreements entered into by either LG Display or AUO with the following entities:

Lemelson Foundation  
Columbia University  
Semiconductor Energy Laboratory Co., Ltd.  
Seiko Precision Inc.  
Penn State Research Foundation  
NEC  
Honeywell International Inc. & Honeywell Intellectual Properties Inc.  
Plasma Physics Corporation  
Ferguson Patent Properties, LLC  
Hitachi  
Merck & Co.  
Toshiba  
Rockwell Collins Inc.  
Chunghwa Picture Tubes  
Kodak  
Samsung  
Sharp



The Honorable Mary Pat Thyng  
April 29, 2008  
Page Two

Matsushita  
Semiconductor Energy Laboratory  
Guardian Industries  
Fujitsu  
IBM

Although a protective order has not yet been entered in this case, the parties have agreed that these license agreements are highly confidential under Local Rule 26.2 and will only be disclosed to outside counsel and the Court. LG Display believes that entry of such an order will facilitate the Court's ability to review the license agreements in advance of the May 13 mediation date. Attached for Your Honor's consideration is a proposed order directing the production of the aforementioned license agreements.

Counsel for LG Display has discussed the foregoing approach with counsel for AUO, which has stated its belief that this order is 'premature.' However, with the mediation date fast approaching, and with mediation statements due this Friday, May 2, LG Display submits this approach is well advised and requests the Court to enter the proposed order.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard D. Kirk', written over a horizontal line.

Richard D. Kirk (rk0922)

cc: Counsel as shown on the attached certificate

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS  
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (GMS)

Civil Action No. 07-357 (GMS)

**CONSOLIDATED CASES**

**MEDIATION ORDER DIRECTING MUTUAL  
PRODUCTION OF LICENSE AGREEMENTS**

The Court having considered plaintiff LG Display Co., Ltd.'s ("LG Display's") request for the disclosure of certain license agreements entered into by defendant AU Optonics Corporation ("AUO"), and AUO's request for the disclosure of certain license agreements entered into by LG Display, and having further considered the parties' agreement to treat all license agreements exchanged as highly confidential under Local Rule 26.2 and limited to review by outside counsel only,

**IT IS ORDERED** that LG Display and AUO produce at least the license agreements, if any, between either LG Display or AUO and the following entities: Lemelson Foundation, Columbia University, Semiconductor Energy Laboratory Co., Ltd., Seiko Precision Inc., Penn State Research Foundation, NEC, Honeywell International Inc., Honeywell Intellectual Properties Inc., Plasma Physics Corporation, Fergason Patent Properties, LLC, Hitachi, Merck & Co., Toshiba, Rockwell Collins Inc., Chunghwa Picture Tubes, Kodak, Samsung, Sharp, Matsushita, Guardian Industries, Fujitsu, and IBM.

In Wilmington this \_\_ day of  
April, 2008.

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

### CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on April 29, 2008, he served the foregoing documents by email and by hand upon the following counsel:

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The undersigned counsel further certifies that, on April 29, 2008, he served the foregoing documents by email and by U.S. Mail upon the following counsel:

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